



Risk Management Program, Section 112(r) of CAA

NASTPO April 5, 2005

Kelly Huynh, RMP Coordinator

huynh.kelly@epa.gov or 206-553-1679

Risk Management Program Agenda

- Purpose of RMP
- Subjectivity to RMP
- Content of RMP

Purpose of RMP



Bhopal, India 1984
Union Carbide factory and the residential area surrounding it.

Purpose of RMP

- 1986 EPCRA emphasizes knowing what chemicals are present and reporting spills
- 1990 RMP emphasizes preventing and planning for toxic chemical & flammable gas accidents



Approx 16,000
people killed in
Bhopal

Photo - Courtesy : Pablo Bartholomew
Copyright © 1985 All Right Reserved - Pablo Bartholomew / Gamma- Liaison Network

Subjectivity to RMP

- Facilities w/ greater than a threshold quantity of an acutely toxic or flammable chemical in a process
 - 144 chemicals in List of Lists
- General Duty Clause
 - Facilities that handle hazardous substances bear the primary responsibility for ensuring their safe use.
 - Applies to any facility that handles any hazardous substance, regardless of quantity

Subjectivity to RMP

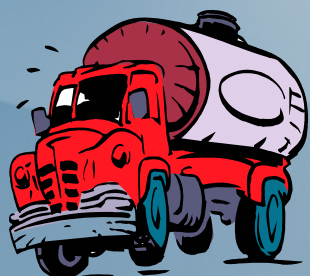
Process

- Use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities.
- Any group of interconnected vessels, or separate vessels, or separate vessels that are located such that a regulated substance could be involved in a potential release.

Subjectivity to RMP

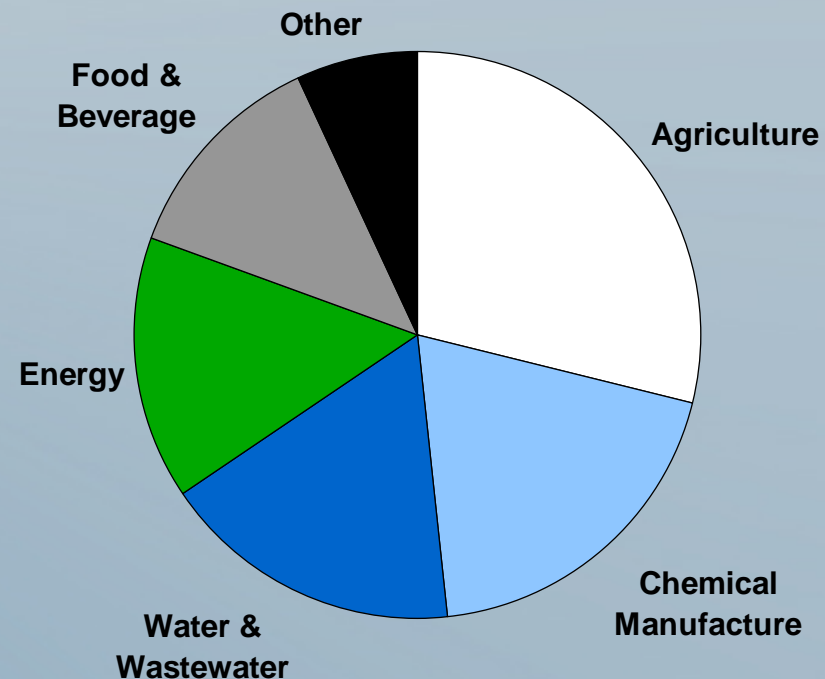
Exemptions:

- Farmers using ammonia fertilizer
- Flammable substances used as fuel or held for sale as a fuel at a retail facility
- Chemicals in transportation, including storage incident to transportation
- Naturally occurring hydrocarbon mixtures prior to entering a processing plant
- Laboratory chemicals



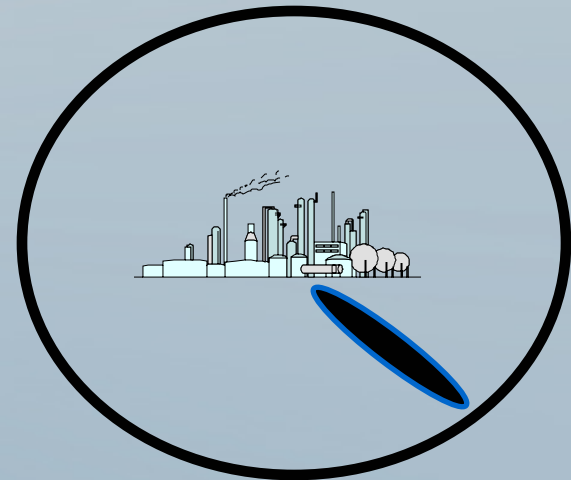
Subjectivity to RMP

- Fertilizers
retailers/producers
- Cold Food Storage
- Water/WW
Treatment Plants
- Chemical Industry
- Refineries



Content of RMP

- Hazard Assessment
offsite impacts (# of people/area) of a potential worst-case and more probable accidental release. 5-yr accident history.
- Prevention Program
Hazard identification, system maintenance, operating procedures, operator training, and incident investigations.
- Emergency Response Program
Identify who, when & how response occurs; how health care will be provided; H&S training; procedures for informing the public; and coordinating with ER agencies (community emergency response plan)



Content of RMP

Are Facilities Prepared to Respond?

- 72% of facilities report that they have their own emergency response plan.
- 82% report that they are part of the community's written response plan.
- 99.9% report that they coordinated with a local agency.

[Based on RMP data]

Content of RMP

- Must fully update and resubmit RMP every 5 years.
 - Most due June 21, 2004
- April 9, 2004 Revised RMP Rule required administrative changes by June 21, 2004.
 - Update emergency contact w/in 1 month
 - Update 5-yr accidents w/in 6 months
 - Include emergency contact email, contractor use and include reason for RMP submission
 - No OCA data needed in Executive Summary

Chemical Safety Information, Site Security and Fuels Regulatory Relief Act 08-04-00

- **OCA data (worst case and alternative scenarios) deemed sensitive. RMPs taken off internet.**
- **Federal, state, local officials, members of SERCs and LEPCs may have the OCA data for their area, but may not release that data to the public**
- **The public must use EPA federal reading rooms**
 - **(907) 271-3414 Anchorage**
 - **(206) 553-1679 Seattle**

Hazardous Materials Continuum



For more information

EPA HQ website for EPCRA and RMP:

- <http://yosemite.epa.gov/oswer/ceppoweb.nsf/>